

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

IN THE MATTER OF:

BK Case No. 13-82458
Chapter 13

KATHLEEN M. JOHNSON,
Debtor(s).

**LIMITED MOTION TO MODIFY
CHAPTER 13 PLAN AFTER
CONFIRMATION**

The above-listed debtor(s) move(s) the Court for an order modifying the plan pursuant to 11 U.S.C. §1329 and Neb. R. Bankr. P. 3015-3(B) as specifically noted below [select all that are applicable and complete each PART]:

PART A

- ☒ 1. The plan shall be modified to cure all delinquent payments as of the date of this motion. [If no election to change future payments is made under Nos 2 and 3 of Part A, then plan payments shall resume by the end of the month in which this motion is filed.]
- ☐ 2. The plan shall be modified to abate future plan payments beginning in the month of _____, 20____, with plan payments to resume in the month of _____, 20____.
- ☐ 3. The plan shall be modified to reduce plan payments to the amount of \$ _____ beginning in the month of _____, 20____, with plan payments to resume in the month of _____, 20____.
- ☐ a. From each reduced plan payment, adequate protection payments shall be made to the following creditors and in the following amounts:

Creditor's Name(s) Payment	Amount of
_____	\$ _____
_____	\$ _____
_____	\$ _____

PART B

- ☒ 1. The base amount of the plan shall remain the same.
- ☐ 2. Beginning with the next plan payment, all future plan payments shall increase to
- ☐ 3. The base amount of the plan shall increase to \$

The attorney for the debtor(s) by signing this motion, certifies that the plan, as modified, will be completed within 60 months from date of confirmation and have computed the remaining available months and base amount of the plan as set forth in Neb. R. Bankr. P. 3015-3(B).

PART C

The reason(s) for this plan modification are as follows: Debtor fell behind in her payments but will resume her payments in March 2018.

WHEREFORE, the Debtor(s) pray(s) that the Court approve this Limited Motion to Modify Chapter 13 Plan After Confirmation.

Dated February 23, 2018

KATHLEEN M. JOHNSON,
Debtor(s)

By: ***s/ Burke Smith***

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NOTICE OF OBJECTION DEADLINE

PURSUANT TO NEB. R. BANKR. P. 9013-1, ANY OBJECTION TO THE MOTION TO MODIFY MUST BE FILED WITH THE BANKRUPTCY COURT AND SERVED ON THE ABOVE ATTORNEY FOR THE DEBTOR(S), IF NOT REPRESENTED BY AN ATTORNEY, ON OR BEFORE: **MARCH 16, 2018**

IF NO OBJECTION IS FILED, THEN THE MOTION SHALL BE APPROVED. IF AN OBJECTION IS FILED, THE DEBTOR(S) MUST FILE A RESPONSE WITHIN 14 DAYS AFTER THE ABOVE OBJECTION DATE. IF NO RESPONSE IS FILED, THE MOTION WILL BE DENIED. AFTER FILING OF A RESPONSE BY THE DEBTOR, THE OBJECTION SHALL PROCEED IN THE MANNER SET FORTH IN NEB R. BANKR. P. 3015-2(E).

CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2018, I caused filing of the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, and further certify that on the same date I mailed by United States Postal Service, postage prepaid, the document to the non-CM/ECF participants named on the current matrix.

By: /s/ Burke Smith